

JS 44C/SDNY
REV. 2/2014

CIVIL COVER SHEET

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for use of the Clerk of Court for the purpose of initiating the civil docket sheet.

PLAINTIFFS

CENGAGE LEARNING, INC.; MCGRAW-HILL GLOBAL EDUCATION HOLDINGS, LLC; and PEARSON EDUCATION, INC.

DEFENDANTS

RAZAN ALZOUBI; RAZAN ZOHEIR ALZOUBI; RAZAN ZOHEIR AL-ZOUBI; R. GHRIRI; RAZAN GHRIRI; RAZAN Z. GHRIRI; RAZAN ZOHEIR GHRIRI; M. OORAAABI; RAZAN ZOUBI; d/b/a ANNE2009; APPLTEXTBOOKS;

ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)

Matthew J. Oppenheim and Julie C. Chen
Oppenheim + Zebrak, LLP
4400 Jenifer St NW, Suite 250, Washington, DC 20015 (202) 621-9027

ATTORNEYS (IF KNOWN)

CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE)
(DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY)

Copyright and Trademark Infringement, Illegal Importation of Goods, Unfair Competition (17 U.S.C. §§ 101, et seq.; 15 U.S.C. § 1114; etc.)

Has this action, case, or proceeding, or one essentially the same been previously filed in SDNY at any time? No ☐ Yes ☐ Judge Previously AssignedIf yes, was this case Vol. ☐ Invol. ☐ Dismissed. No ☐ Yes ☐ If yes, give date _____ & Case No. _____Is THIS AN INTERNATIONAL ARBITRATION CASE? No ☒ Yes ☐

(PLACE AN [x] IN ONE BOX ONLY)

NATURE OF SUIT

TORTS		ACTIONS UNDER STATUTES			
CONTRACT	PERSONAL INJURY	PERSONAL INJURY	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
[] 110 INSURANCE	[] 310 AIRPLANE	[] 362 PERSONAL INJURY -	[] 610 AGRICULTURE	[] 422 APPEAL	[] 400 STATE
[] 120 MARINE	[] 315 AIRPLANE PRODUCT	MED MALPRACTICE	[] 620 OTHER FOOD &	28 USC 158	REAPPORTIONMENT
[] 130 MILLER ACT	LIABILITY	[] 365 PERSONAL INJURY	DRUG	[] 423 WITHDRAWAL	[] 410 ANTI-TRUST
[] 140 NEGOTIABLE	[] 320 ASSAULT, LIBEL &	PRODUCT LIABILITY	[] 625 DRUG RELATED	28 USC 157	[] 430 BANKS & BANKING
INSTRUMENT	SLANDER	[] 368 ASBESTOS PERSONAL	SEIZURE OF		[] 450 COMMERCE
[] 150 RECOVERY OF	[] 330 FEDERAL	INJURY PRODUCT	PROPERTY		[] 460 DEPORTATION
OVERPAYMENT &	EMPLOYERS'	LIABILITY	21 USC 881	PROPERTY RIGHTS	[] 470 RACKETEER INFLU-
ENFORCEMENT	LIABILITY		[] 630 LIQUOR LAWS		ENCED & CORRUPT
OF JUDGMENT	[] 340 MARINE	PERSONAL PROPERTY	[] 640 RR & TRUCK	[] 820 COPYRIGHTS	ORGANIZATION ACT
[] 151 MEDICARE ACT	[] 345 MARINE PRODUCT		[] 650 AIRLINE REGS	[] 830 PATENT	(RICO)
[] 152 RECOVERY OF	LIABILITY	[] 370 OTHER FRAUD	[] 660 OCCUPATIONAL	[] 840 TRADEMARK	[] 480 CONSUMER CREDIT
DEFAULTED	[] 350 MOTOR VEHICLE	[] 371 TRUTH IN LENDING	SAFETY/HEALTH		[] 490 CABLE/SATELLITE TV
STUDENT LOANS	[] 355 MOTOR VEHICLE	[] 380 OTHER PERSONAL	OTHER		[] 810 SELECTIVE SERVICE
(EXCL VETERANS)	PRODUCT LIABILITY	PROPERTY DAMAGE		SOCIAL SECURITY	[] 850 SECURITIES/
[] 153 RECOVERY OF	[] 360 OTHER PERSONAL	PRODUCT LIABILITY	LABOR		COMMODITIES/
OVERPAYMENT	INJURY			[] 861 HIA (1395ff)	EXCHANGE
OF VETERANS'			[] 710 FAIR LABOR	[] 862 BLACK LUNG (923)	[] 875 CUSTOMER
BENEFITS			STANDARDS ACT	[] 863 DIWC/DIWW (405(g))	CHALLENGE
[] 160 STOCKHOLDERS			LABOR/MGMT	[] 864 SSID TITLE XVI	12 USC 3410
SUITS			[] 720 RELATIONS	[] 865 RSI (405(g))	[] 890 OTHER STATUTORY
[] 190 OTHER		PRISONER PETITIONS	[] 730 LABOR/MGMT		ACTIONS
CONTRACT		[] 510 MOTIONS TO	REPORTING &	FEDERAL TAX SUITS	[] 891 AGRICULTURAL ACTS
[] 195 CONTRACT	ACTIONS UNDER STATUTES	VACATE SENTENCE	DISCLOSURE ACT		[] 892 ECONOMIC
PRODUCT	CIVIL RIGHTS	28 USC 2255	[] 740 RAILWAY LABOR ACT	[] 870 TAXES (U.S. Plaintiff or	[] 893 ENVIRONMENTAL
LIABILITY	[] 441 VOTING	[] 530 HABEAS CORPUS	[] 790 OTHER LABOR	Defendant)	MATTERS
[] 196 FRANCHISE	[] 442 EMPLOYMENT	[] 535 DEATH PENALTY	LITIGATION	[] 871 IRS-THIRD PARTY	[] 894 ENERGY
	[] 443 HOUSING/	[] 540 MANDAMUS & OTHER	[] 791 EMPL RET INC	26 USC 7609	ALLOCATION ACT
	ACCOMMODATIONS		SECURITY ACT		[] 895 FREEDOM OF
REAL PROPERTY	[] 444 WELFARE	PRISONER CIVIL RIGHTS	IMMIGRATION		INFORMATION ACT
[] 210 LAND	[] 445 AMERICANS WITH	[] 550 CIVIL RIGHTS	[] 462 NATURALIZATION		[] 900 APPEAL OF FEE
CONDEMNATION	DISABILITIES -	[] 555 PRISON CONDITION	APPLICATION		DETERMINATION
[] 220 FORECLOSURE	EMPLOYMENT		[] 463 HABEAS CORPUS-		UNDER EQUAL
[] 230 RENT LEASE &	[] 446 AMERICANS WITH		ALIEN DETAINEE		ACCESS TO JUSTICE
EJECTMENT	DISABILITIES -OTHER		[] 465 OTHER IMMIGRATION		CONSTITUTIONALITY
[] 240 TORTS TO LAND	[] 440 OTHER CIVIL RIGHTS		ACTIONS		OF STATE STATUTES
[] 245 TORT PRODUCT	(Non-Prisoner)				
LIABILITY					
[] 290 ALL OTHER					
REAL PROPERTY					

Check if demanded in complaint:

☐ CHECK IF THIS IS A CLASS ACTION
UNDER F.R.C.P. 23DO YOU CLAIM THIS CASE IS RELATED TO A CIVIL CASE NOW PENDING IN S.D.N.Y.?
IF SO, STATE:

DEMAND \$ _____ OTHER _____ JUDGE _____ DOCKET NUMBER _____

Check YES only if demanded in complaint

JURY DEMAND: ☒ YES ☐ NO

NOTE: You must also submit at the time of filing the Statement of Relatedness form (Form IH-32).

(PLACE AN x IN ONE BOX ONLY)

ORIGIN

- ☒ 1 Original Proceeding
 ☐ 2 Removed from State Court
 ☐ 3 Remanded from Appellate Court
 ☐ 4 Reinstated or Reopened
 ☐ 5 Transferred from (Specify District)
 ☐ 6 Multidistrict Litigation
 ☐ 7 Appeal to District Judge from Magistrate Judge Judgment
- ☐ a. all parties represented
☐ b. At least one party is pro se.

(PLACE AN x IN ONE BOX ONLY)

BASIS OF JURISDICTION

- ☐ 1 U.S. PLAINTIFF
 ☐ 2 U.S. DEFENDANT
 ☒ 3 FEDERAL QUESTION (U.S. NOT A PARTY)
 ☐ 4 DIVERSITY

IF DIVERSITY, INDICATE
CITIZENSHIP BELOW.
(28 USC 1332, 1441)

CITIZENSHIP OF PRINCIPAL PARTIES (FOR DIVERSITY CASES ONLY)

(Place an [X] in one box for Plaintiff and one box for Defendant)

CITIZEN OF THIS STATE	PTF [] DEF []	CITIZEN OR SUBJECT OF A FOREIGN COUNTRY	PTF [] DEF []	INCORPORATED and PRINCIPAL PLACE OF BUSINESS IN ANOTHER STATE	PTF [] DEF []
CITIZEN OF ANOTHER STATE	[] []	INCORPORATED or PRINCIPAL PLACE OF BUSINESS IN THIS STATE	[] []	FOREIGN NATION	[] []

PLAINTIFF(S) ADDRESS(ES) AND COUNTY(IES)

Cengage Learning, Inc., 200 First Stamford Place, 4th Floor, Stamford, CT 06902
 McGraw-Hill Global Education Holdings, LLC, 2 Penn Plaza, 12th Floor, New York, NY 10121
 Pearson Education, Inc., One Lake Street, Upper Saddle River, NJ 07458

DEFENDANT(S) ADDRESS(ES) AND COUNTY(IES)

160 Algonquin Avenue
 Holland, MI 49424

DEFENDANT(S) ADDRESS UNKNOWN

REPRESENTATION IS HEREBY MADE THAT, AT THIS TIME, I HAVE BEEN UNABLE, WITH REASONABLE DILIGENCE, TO ASCERTAIN THE RESIDENCE ADDRESSES OF THE FOLLOWING DEFENDANTS:

Check one: THIS ACTION SHOULD BE ASSIGNED TO: ☐ WHITE PLAINS ☒ MANHATTAN
 (DO NOT check either box if this a PRISONER PETITION/PRISONER CIVIL RIGHTS COMPLAINT.)

DATE 4/2/2014 SIGNATURE OF ATTORNEY OF RECORD

ADMITTED TO PRACTICE IN THIS DISTRICT

[] NO

☒ YES (DATE ADMITTED Mo. 10 Yr. 2006)

Attorney Bar Code # 4314605

RECEIPT #

Magistrate Judge is to be designated by the Clerk of the Court.

Magistrate Judge _____ is so Designated.

Ruby J. Krajick, Clerk of Court by _____ Deputy Clerk, DATED _____.

UNITED STATES DISTRICT COURT (NEW YORK SOUTHERN)